

REMARKS

Applicants request favorable reconsideration and allowance of the subject application in view of the preceding amendments and the following remarks.

Claims 1-50 are presented for consideration. Claims 1, 28, 36, 40 and 44 are independent. Claims 1 and 4 have been amended to clarify features of the subject invention, while claims 36-50 have been added to recite additional features of the subject invention. Support for these changes and claims can be found in the original application, as filed. Therefore, no new matter has been added.

Initially, Applicants note with appreciation that claims 28-35 have been allowed. In addition to these claims being allowable, Applicants submit that claims 1-27 and 36-50 patentably define features of the subject invention. Therefore, Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-noted Office Action.

Claims 1-9 and 11-20 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,271,606 to Hazelton. Claim 10 was rejected under 35 U.S.C. § 103 as being unpatentable over the Hazelton patent in view of U.S. Patent No. 5,858,587 to Yamane et al. Claims 21-27 were rejected under 35 U.S.C. § 103 as being unpatentable over the Hazelton patent in view of U.S. patent application publication number US 2001/0052967 to Ogura et al. Applicants submit that the cited art, whether taken individually or in combination, does not teach many features of the present invention as previously recited in claims 1-27. Therefore, these rejections are respectfully traversed. Nevertheless, Applicants submit that independent claim 1,

for example, as presented, amplifies the distinctions between the present invention and the cited art.

Independent claim 1 recites a moving mechanism that includes a reference structure having a guide surface, a movable member being movable along the guide surface and a plurality of actuators disposed on opposite sides of the movable member. Each of the plurality of actuators has a movable element and a stator for driving the movable member two-dimensionally along the guide surface. Each of the movable elements of the plurality of actuators is movable together with the movable member, and each of the stators of the plurality of actuators is movable two-dimensionally by a reactor force produced in response to the driving of the movable member.

Applicants submit that the cited art does not teach such features of the present invention, as recited in independent claim 1.

The Hazelton patent shows a linear-motor driven stage system in which a stator functions as a counter-mass to cancel a reaction force in a direction in which a movable portion is driven. In that patent, an actuator is arranged so that, by use of a reaction force produced when a movable element is moved linearly, a stator is moved in an opposite direction. This patent also discusses cancelling a force in a direction different from the driving direction of the movable element, at the stator side of the actuator. Applicants submit, however, that the Hazelton patent is silent with respect to moving (or causing to be movable) a stator of an actuator for moving a movable element two-dimensionally relative to the stator, by use of a drive reaction force. Applicants

further submit, therefore, that the Hazelton patent does not teach or suggest the salient features of Applicants' present invention as recited in independent claim 1.

In addition, Applicants submit that the remaining art cited does not cure the deficiencies noted above with respect to the Hazelton patent.

The Yamane et al. patent shows a stage structure having an X-Y-Z stage with non-contact bearings and θ, Z and tilt stages. The Ogura publication shows a local area network for a semiconductor factory. Applicants submit, however, that these citations, as with the Hazelton patent, do not teach or suggest the salient features of Applicants' present invention as recited in independent claim 1, which have been discussed above. Therefore, those citations add nothing to the teachings of the Hazelton patent that would render obvious Applicant's present invention recited in independent claim 1.

Applicants further submit that the present invention is patentably defined by new claims 36-50. Specifically, the cited art is not read to teach or suggest the features of the moving mechanism of the present invention recited in independent claim 36, which includes an arrangement of a stage and an actuator, the features of the moving mechanism of the present invention recited in independent claim 40, which includes an arrangement of a stage and a plurality of actuators, or the features of the exposure apparatus of the present invention recited in independent claim 44, which includes an arrangement of a stage and an actuator. Accordingly, Applicants submit that the present invention, as recited in independent claims 36, 40 and 44, also should be deemed allowable.

For the reasons noted above, Applicant submits that the present invention, as recited in independent claims 1, 36, 40 and 44, also is patentably defined over the cited art.

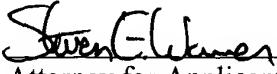
Dependent claims 2-27, 37-39, 41-43 and 45-50 also should be deemed allowable, in their own right, for defining other patentable features of the present invention in addition to those recited in their respective independent claims. Further individual consideration of these dependent claims is requested.

Applicants further submit that this Amendment After Final Rejection clearly places this application in condition for allowance. This Amendment was not earlier presented because Applicants believed that the prior Amendment placed the application in condition for allowance. Accordingly, entry of the instant Amendment, as an earnest attempt to advance prosecution and reduce the number of issues, is requested under 37 CFR 1.116.

Favorable reconsideration, withdrawal of the rejections set forth in the above-noted Office Action and an early Notice of Allowance are also requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should be directed to our address listed below.

Respectfully submitted,



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APPENDIX A

IN THE CLAIMS

1. (Amended) A moving mechanism, comprising:

a reference structure having a guide surface;

a movable [portion] member being movable along the guide surface; and

[an actuator having movable elements, provided at opposite end portions of the stage, and at least two stators, said stators being separated from each other and each being movable in two-dimensional directions by a reaction force produced as the movable portion is driven] a plurality of actuators disposed on opposite sides of said movable member, wherein each of said plurality of actuators has a movable element and a stator for driving said movable member two-dimensionally along the guide surface, each of the movable elements of said plurality of actuators is movable together with said movable member, and each of the stators of said plurality of actuators is movable two-dimensionally by a reactor force produced in response to the driving of the movable member.

4. (Amended) A moving mechanism according to Claim 1, wherein each of said [actuator] actuators is a linear motor having [a] the movable element and [a] the stator.